

March 22, 2018

Jason Gerner, CEO
Branden Coluccio, CFO
Liberation Way
70 West Afton Avenue #101
Yardley, PA 19067

Re: Facility Numbers: 097105; 467134

Dear Gentleman:

The Department of Drug and Alcohol Programs (DDAP) conducted an onsite visit on 11/2/17 at the Yardley location and 11/16/17 and 12/12/17-12/13/17 at the Fort Washington location; license numbers 09105 and 467134. During the inspections, areas of noncompliance were cited under 28 Pa. Code, Chapters 709 and 715. These areas of noncompliance included:

- 28 Pa. Code §709.24 (a)(3)
- 28 Pa. Code §709.28 (a)(1)
- 28 Pa. Code §709.29 (a)
- 28 Pa. Code §709.30 (1)
- 28 Pa. Code §709.21 (b)
- 28 Pa. Code §709.32 (c) (1-4)
- 28 Pa. Code §709.91 (a) (2 and 3)
- 28 Pa. Code §715.1 (a)(b)
- 28 Pa. Code §715.2 (a)(b)
- 28 Pa. Code §709.28 (c)(1-5)
- 28 Pa. Code §705.23 (3)

Additionally, on November 2, 2017, out of concern for the safety of your patients, my office directed you to stop the unauthorized and unpermitted buprenorphine maintenance activity (obtaining and holding narcotic prescriptions) with patients at the Yardley facility. The same directive was given to the CEO on November 16, 2017 at the Fort Washing facility. During a site visit on December 13, 2017 at Fort Washington, Liberation Way provided DDAP with charts identified as current “maintenance patients” at Yardley. The Fort Washington site failed to produce accurate and updated medication logs to account for patient dosing and medications, employees are unclear of their roles at the facility, there are no clear distinctions between Liberation Way housing and treatment, and continuous failure to adhere to state and federal regulations has placed your patient’s health and safety at risk. Our office believes this lack of distinction between the treatment facility and housing contributed to the theft of narcotic medications that a Liberation Way staff member brought to a Liberation Way house without DEA or DDAP approval.

Please be advised it your responsibly to keep all patients safe. The actions of Liberation Way have violated state and federal regulations, which compromised patients' safety and confidentiality. Accordingly, immediate action must be taken to ensure adherence to state and federal regulations, a clear distinction between Liberation Way treatment and Liberation Way housing and discontinued use of any unauthorized treatment activities in each respective location to ensure client safety. If you fail to take these steps to protect your patients, DDAP will take legal action to seek an injunction for the closure of your facilities. 28 Pa. Code §715.4 and §709.17.

The Department directs Liberation Way – licenses # 097105 and 467137 to halt admissions at their licensed drug and alcohol programs upon receipt of this letter. The Department further directs Liberation Way to decrease the patient census at both the Yardley and Fort Washington locations. The patient census for the Outpatient Drug-Free activity for license # 097105 must be reduced from 65 to 15 and 40 to 10 for the partial-hospitalization licensed activity within 60 days. The patient census for the Outpatient Drug-Free, partial hospitalization and detoxification activities for license # 467137 must be reduced from 20 to 5 within 60 days. This process is to begin immediately and shall be accomplished through active referrals of patients to other licensed drug and alcohol programs within the respective areas.

Should you need assistance with the referral of any and/or all patients, DDAP will work with you and other providers to facilitate the transfer of your patients to other local facilities. Failure to comply with a directive issued by the Department is a basis for seeking revocation of your licenses. Please feel free to contact me at (717) 783-8675 to discuss DDAP' s position.

Sincerely,



Wenona Z. Wake, Director
Bureau of Quality Assurance for Prevention & Treatment

Cc: Tawny Mumma
Trelton Johnson, DDAP
Irlene Sweets, DDAP
Gary Stauffer, DDAP
Nancy Buczeskie